

C A N A D A

PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL

N° : 500-17-040674-080

S U P E R I O R C O U R T

MITEC TELECOM INC.

Plaintiff

v.

BIP CORPORATION

Defendant

-and-

EXPORT DEVELOPMENT CANADA

Mise en cause

AFFIDAVIT FOR JUDGMENT

I, the undersigned, DAN PIERGENTILI, businessman, residing and domiciled, for the purpose of the present affidavit, at 9000 Trans-Canada Highway, in the City of Pointe-Claire, District of Montreal, Province of Québec, hereby solemnly affirm:

1. I am the president and chief executive officer of the Plaintiff, Mitec Telecom Inc. (hereinafter "Mitec"), and I am therefore authorized to sign the present affidavit;
2. Mitec is a company specialized in the manufacture and design of microwave and telecom products, as appears from a copy of the Enterprise Register file data, communicated herewith as **Exhibit P-1**;
3. The Defendant, BIP Corporation (hereinafter "**BIP**"), is an American corporation engaged in the business of manufacturing and distributing satellite communication systems;
4. The Mise en cause, Export Development Canada (hereinafter "**EDC**"), is crown corporation wholly owned by the Government of Canada and it provides notably, insurance to Canadian exporters;

5. BIP generally purchases VSATs, block up converters, solid-state power amplifier systems and waveguide components and systems (hereinafter "**Inventory**"), from Mitec who in turn stores it in a segregated warehouse, prior to receiving instructions from BIP to deliver said Inventory;
6. On July 25, 2006, Mitec and BIP entered into a Bill and Hold Agreement (hereinafter the "**Agreement**") pursuant to which the Inventory purchased by BIP from Mitec is stored in a warehouse segregated from Mitec's Pointe-Claire facility, as appears from a copy of the Agreement, communicated herewith as **Exhibit P-2**;
7. From May 30, 2006 to July 27, 2007, BIP placed several purchase orders and instructed Mitec to deliver certain Inventory to its location in California, totalling an amount of US\$488,050.52, as appears from a copy of the invoices and purchase orders communicated together as **Exhibit P-3**;
8. As of today, despite being duly put on notice, BIP neglects, omits and/or refuses to pay Mitec the amount of US\$488,050.52, which continues to be due for the abovementioned merchandise sold, as appears from a copy of the demand letter dated November 15, 2007 which was served on December 4, 2007, as appears from the Declaration of service, communicated together herewith as **Exhibit P-4**;
9. As of the date of the present proceedings, the US dollar exchange rate is 1,0211 for one Canadian dollar, as appears from the document entitled *Rates and Statistics* dated January 15, 2008 provided by the Bank of Canada communicated herewith as **Exhibit P-5**;
10. In consequence of the foregoing Mitec is well founded to claim from BIP the amount of CA\$498,348.39;
11. On May 1, 2004, Mitec purchased insurance from EDC which provides coverage for accounts receivable from foreign buyers (hereinafter the "**Policy**"), as appears from a copy of the Policy as well as the subsequent policy renewals communicated together herewith as **Exhibit P-6**;
12. Consequently, seeing BIP's refusal to honour its obligations towards Mitec and to pay the invoiced amount of US\$488,050.52, the latter submitted to EDC a claim payment application for the same amount which represents its net loss, as appears from a copy of the claim payment application, communicated herewith as **Exhibit P-7**;

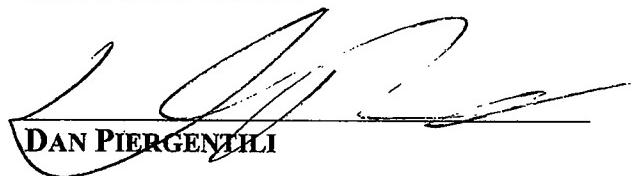
- 3 -

13. On December 11, 2007, alleging that the outstanding amount of US\$488,050.52 is disputed, allegation which Mitec does not admit but expressly denies, EDC refused to assume liability for the claim, as appears from a letter dated December 11, 2007 addressed to Mitec, communicated herewith as **Exhibit P-8**;
14. Consequently, Mitec impleads its insurer, EDC, as a third party to these proceedings in order to ensure that EDC is fully informed of the litigation notably, of the outcome of the alleged dispute;
15. Pursuant to the Agreement, any legal proceeding must be instituted in the judicial district of Montreal:

"8.7 Governing Law. This Agreement shall be governed by and construed in accordance with the laws of the Province of Québec and the federal laws of Canada therein applicable. Each party irrevocably submits to the non-exclusive jurisdiction of the courts of the Province of Québec in the judicial district of Montreal with respect to any matter arising hereunder or related hereto."

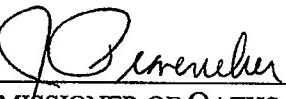
16. All the facts alleged in the present affidavit are true to my personal knowledge.

AND I HAVE SIGNED:



DAN PIERGENTILI

SOLEMNLY DECLARED before me at Montréal,
this 27th day of February 2008



COMMISSIONER OF OATHS



No. 500-17-040674-080

SUPERIOR COURT
DISTRICT OF MONTREAL

MITEC TELECOM INC.,

Plaintiff
v.

BIP CORPORATION,

Defendant
-and-

EXPORT DEVELOPMENT CANADA,

Mise en cause

Me Anca Neacsu

File : 606778-127

AFFIDAVIT FOR JUDGMENT

Original



FRASER MILNER CASGRAIN LLP

1, PLACE VILLE-MARIE • 39TH FLOOR
MONTRÉAL QC H3B 4M7
TELEPHONE: (514) 878-8800 • FAX: (514) 866-2241

BB0822

2008-02-05
H:21:42:42LE REGISTRAIRE DES ENTREPRISES
SYSTÈME CIDREQ

P-PU-U03-1

ÉTAT DES INFORMATIONS SUR UNE PERSONNE MORALE
INFORMATIONS GÉNÉRALES
=====

MATRICULE: 1145955283

NOM: MITEC TELECOM INC.

IMMATRICULATION : 1996-07-08
 FORMATION : 1996-05-01 FUSION
 LOCALITÉ : CANADA

DERN DÉCL ANNL : 2007-09-04 2007 DEMANDE DISS/LIQ EN COURS: NON
 MAJ ÉTAT INFO : 2007-09-04 TRANCHE EMPLOYÉS: ENTRE 100 ET 249
 CESSATION PRÉVUE: CONTINUAT: TRANSFORM:
 STATUT IMMATR : IM IMMATICULÉ 1996-07-08
 RÉSULTANTE :
 FORME JURDQ : CIE COMPAGNIE

ADRESSE DOMICILE: 9000, AUTOROUTE TRANS CANADA CODE POSTAL: H9R 5Z8
 POINTE-CLAIRE QC

RÉG. CONSTITUTIF: 104 LOI SUR LES SOCIÉTÉS PAR ACTIONS (RÉGIME FÉDÉRAL)
 RÉG. COURANT : 104 LOI SUR LES SOCIÉTÉS PAR ACTIONS (RÉGIME FÉDÉRAL)

ACTIVITÉS ÉCONOMIQUES
=====

5521 MANUFACTURERS AND DESIGNERS OF MICROWAVE AND TELECOM PRODUCTS

ADRESSE POSTALE
=====

DESTINATAIRE : CHARLES R. SPECTOR

ADRESSE : 1, PL VILLE MARIE BUR 3900 CODE POSTAL: H3B 4M7
 MONTRÉAL QC

PERSONNES LIÉES
=====

PERSONNES MANQUANTES: NON

NOM ET ADRESSE

CODE POSTAL

DÉTAIL PERSONNE

=====

=====

AU PORTEUR

ACTIONNAIRE

DEUXIÈME ACTIONNAIRE

SON TATTERSALL INVESTMENT COUNSEL

ACTIONNAIRE

PREMIER ACTIONNAIRE

151, YOUGE STREET, SUITE 1700

M5C 2W7

TORONTO (ONTARIO)

GROOME, RICHARD T.

ADMINISTRATEUR
ADMINISTRATEUR1, PLACE VILLE-MARIE, BUR. 1812
MONTRÉAL (QUÉBEC)

H3B 4A9

CHERRY, JAMES

ADMINISTRATEUR
ADMINISTRATEUR240, RUE OSBORNE
SAINT-LAMBERT (QUÉBEC)

J4R 1B5

MARLEAU, HUBERT R.

ADMINISTRATEUR
ADMINISTRATEUR101, PLACE MONT-ROYAL APP 1201
MONTRÉAL QC

H3A 1P2

SPECTOR, CHARLES R

ADMINISTRATEUR
ADMINISTRATEURAV RENFREW
STMOUNT QC

H3Y 2X3

MANDEL, JEFFREY A.

ADMINISTRATEUR
ADMINISTRATEUR105, WORTH BLVD.
THORNHILL (ONTARIO)

L4J 7V5

PIERGENTILI, DANIEL

ADMINISTRATEUR
PRÉSIDENT1681, BROWN COURT
LOGMONT (COLORADO) 80503
ÉTATS-UNIS

DUMAIS, BRUNO

NON MEMBRE DU C.A.
PRINCIPAL DIRIGEANT162, CHEMIN WOODSIDE
BEACONSFIELD QC

H9W 2N8

RELATIONS ENTRE ASSUJETTIS

MATRICULE	RELATION	DÉNOMINATION SOCIALE	DATE EFFCT
=====	=====	=====	=====
COMPOSANT (FO)	MITEC ELECTRONICS LTD		1996-05-01

1140398760 COMPOSANT (FO) 3007529 CANADA INC. 1996-05-01

NOMS DE L'ASSUJETTI

DATE MAJ INDEX DES NOMS :

NOM DE L'ASSUJETTI	DATE DÉBUT	DATE FIN	STATUT
=====	=====	=====	=====
MITEC TELECOM INC.	1996-05-01		EN VIGUEUR

DOCUMENTS MICROFILMÉS

TYPE DOCUMENTS	DATE	CAST	IMAGE
=====	=====	=====	=====
107 DÉCLARATION ANNUELLE 2007	2007-09-04	7122	22 035
106 DÉCLARATION ANNUELLE 2006	2006-11-09	6874	51 015
19 DÉCLARATION MODIFICATIVE	2006-10-16	6985	7 020
105 DÉCLARATION ANNUELLE 2005	2005-11-18	6533	24 012
104 DÉCLARATION ANNUELLE 2004	2004-12-07	6177	48 027
103 DÉCLARATION ANNUELLE 2003	2003-11-06	5702	20 013
19 DÉCLARATION MODIFICATIVE	2003-04-03	5500	39 038
19 DÉCLARATION MODIFICATIVE	2002-11-21	5358	6 013
102 DÉCLARATION ANNUELLE 2002	2002-10-30	5395	34 003
19 DÉCLARATION MODIFICATIVE	2002-01-29	5056	64 020
101 DÉCLARATION ANNUELLE 2001	2001-10-24	4970	11 046
19 DÉCLARATION MODIFICATIVE	2001-02-08	4755	11 038
100 DÉCLARATION ANNUELLE 2000	2000-11-22	4655	15 046
19 DÉCLARATION MODIFICATIVE	2000-03-28	4446	32 006
199 DÉCLARATION ANNUELLE 1999	1999-10-25	4269	43 017
19 DÉCLARATION MODIFICATIVE	1999-07-28	3965	1 043
198 DÉCLARATION ANNUELLE 1998	1999-01-13	3783	5 026
19 DÉCLARATION MODIFICATIVE	1998-05-21	3543	7 004
19 DÉCLARATION MODIFICATIVE	1998-04-14	3513	43 034
197 DÉCLARATION ANNUELLE 1997	1998-01-29	3428	21 015
196 DÉCLARATION ANNUELLE 1996	1997-02-04	3129	43 034
19 DÉCLARATION D'IMMATRICULATION	1996-07-08	2957	44 013

AUTRES NOMS

DATE MAJ INDEX DES NOMS :

NOM	DATE DÉBUT	DATE FIN	STATUT
MITEC BEVE	2001-10-24		EN VIGUEUR

No. 500-17-040674-080

SUPERIOR COURT
DISTRICT OF MONTREAL

MITEC TELECOM INC.,

Plaintiff
v.

BIP CORPORATION,

Defendant
-and-

EXPORT DEVELOPMENT CANADA,

Mise en cause

Me Anca Neacsu

File : 606778-127

EXHIBIT P-1



FRASER MILNER CASGRAIN LLP

1, PLACE VILLE-MARIE • 39TH FLOOR
MONTRÉAL QC H3B 4M7
TELEPHONE: (514) 878-8800 • FAX: (514) 866-2241

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[Monetary Policy](#) [Bank Notes](#) [Financial System](#) [Publications and Research](#) [Rates and Statistics](#)

Rates and Statistics

Daily Digest Exchange rates Interest rates Price Indexes Indicators Related information	RATES AND STATISTICS Exchange Rates	Text Print Daily currency converter	SEE ALSO: 10-Year Currency Converter
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SEE ALSO:
[10-Year Currency Converter](#)

Using rates for: 14 Jan 2008

NEW: The following currencies are now available for converting: Serbian Dinar, Romanian Ron and UAE Dirham. The start date for these new currencies is 3 September 2007.

Convert to and from Canadian dollars, using the latest noon rates.

Currency:	<input type="text" value="U.S. dollar"/>
Amount:	<input type="text" value="488050.52"/>
Convert:	<input type="radio"/> from \$Can <input checked="" type="radio"/> to \$Can
Use the:	<input checked="" type="radio"/> Nominal rate HELP <input type="radio"/> Cash rate (4%) HELP
Answer:	<input type="text" value="498,348.39"/>
Exchange rate:	<input type="text" value="1.0211"/>

Summary:

On 14 Jan 2008, 488050.52 U.S. dollar(s) = 498,348.39 Canadian dollar(s), at an exchange rate of 1.0211 (using nominal rate.)

SEE ALSO:

FREQUENTLY ASKED:

Why is the currency I'm looking for not listed here?

The Bank currently collects data for about 55 foreign currencies. This data is intended primarily for people with a research interest in foreign exchange markets, and represents a sampling of currencies from various regions. It is not meant to be an exhaustive listing of all world currencies.

More comprehensive currency converters are available elsewhere on the web. You may want to try [hifx.com](#) or [oanda.com](#).

Are the exchange rates shown here accepted by Canada Revenue Agency?

Yes. The Agency accepts Bank of Canada exchange rates as the basis for calculations involving income and expenses that are denominated in foreign currencies.

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No. 500-17-040674-080

SUPERIOR COURT
DISTRICT OF MONTREAL

MITEC TELECOM INC.,

Plaintiff
v.

BIP CORPORATION,

Defendant
-and-

EXPORT DEVELOPMENT CANADA,

Mise en cause

Me Anca Neacsu

File : 606778-127

EXHIBIT P-5



FRASER MILNER CASGRAIN LLP

1, PLACE VILLE-MARIE • 39TH FLOOR
MONTRÉAL QC H3B 4M7
TELEPHONE: (514) 878-8800 • FAX: (514) 866-2241

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Export Development Canada
Exportation et développement Canada

The St Paul

St. Paul Guarantee Insurance Company
Compagnie d'Assurance St. Paul Garantie

COVERAGE CERTIFICATE

Accounts Receivable Policy (Shipments)

Insured: Mitec Telecom Inc.

Policy Number: GG 1 13778

Issued: June 3rd, 2004

Effective: May 1st, 2004

Reference Number: 1

This Policy is issued in Ottawa, Ontario by Export Development Canada ("EDC") and by St. Paul Guarantee Insurance Company ("St. Paul Guarantee") (together referred to as the "Insurers"), to Mitec Telecom Inc. (the "Insured"). This Certificate forms part of the Policy and, as of its effective date, it replaces any previous Coverage Certificate.

SPECIFIC TERMS OF COVERAGE PROVIDED UNDER THE POLICY ARE SET OUT BELOW

Coverage Effective Date:	May 1st, 2004
Policy Period:	May 1st to April 30th of each year. If the Policy is terminated on a date other than April 30th the last Policy Period will end on such termination date.
Anniversary Date:	May 1st of each year
Acceptance Fee:	CAD 0
Policy Currency:	USD
EDC's Maximum Liability Amount:	USD 7,000,000
St. Paul Guarantee's Maximum Liability Amount:	USD 500,000
Declaration Period:	Monthly
Declaration Currency:	USD

Insurance Percentage: 90% (subject to section 16 of the Policy General Terms and Conditions)

Deductible: USD 100,000 **Effective Date:** May 1st, 2004

Deductible Period: May 1st to April 30th of each year.
If the Policy is terminated on a date other than April 30th, the Deductible Period shall end as of the termination date.

EXCLUDED CONTRACTS

- Any sales contract with a buyer located in People's Republic of China

ADDRESS FOR NOTICES

to the Insured at:

Mitec Telecom Inc.
9000 Trans Canada Highway
Pointe Claire, PQ, Canada
H9R 5Z8

to the Insurers at:

Export Development Canada
151 O'Connor Street
Ottawa, Ontario, Canada
K1A 1K3

Attention: Mr. Claude Boyer

Attention: Susanne Martin

Tel. Number: 514-694-9000
Fax Number: 514-694-3510

Tel. Number: 1-888-336-9514
Fax Number: 613-598-6858

e-mail address:

e-mail address: smartin@edc.ca

EXPORT DEVELOPMENT CANADA,
for the Insurers





Export Development Canada
Exportation et développement Canada

The St Paul

St. Paul Guarantee Insurance Company
Compagnie d'Assurance St. Paul Garantie

COVERAGE CERTIFICATE

Accounts Receivable Policy (Shipments)

Insured: Mitec Télécom Inc.
Policy Number: GG 1 13778
Issued: October 8th, 2004
Effective: October 1st, 2004
Reference Number: 2

This Policy is issued in Ottawa, Ontario by Export Development Canada ("EDC") and by St. Paul Guarantee Insurance Company ("St. Paul Guarantee") (together referred to as the "Insurers"), to Mitec Télécom Inc. (the "Insured"). This Certificate forms part of the Policy and, as of its effective date, it replaces any previous Coverage Certificate.

SPECIFIC TERMS OF COVERAGE PROVIDED UNDER THE POLICY ARE SET OUT BELOW

Coverage Effective Date:	May 1st, 2004
Policy Period:	May 1st to April 30th of each year. If the Policy is terminated on a date other than April 30th the last Policy Period will end on such termination date.
Anniversary Date:	May 1st of each year
Acceptance Fee:	CAD 0
Policy Currency:	USD
EDC's Maximum Liability Amount:	USD 7,000,000
St. Paul Guarantee's Maximum Liability Amount:	USD 725,000
Declaration Period:	Monthly
Declaration Currency:	USD

Insurance Percentage: 90% (subject to section 16 of the Policy General Terms and Conditions)

Deductible: USD 100,000 **Effective Date:** May 1st, 2004

Deductible Period: May 1st to April 30th of each year.
If the Policy is terminated on a date other than April 30th, the Deductible Period shall end as of the termination date.

EXCLUDED CONTRACTS

- Any sales contract with a buyer located in People's Republic of China

■ ADDRESS FOR NOTICES

to the Insured at:

Mitec Télécom Inc.
9000 Trans Canada Highway
Pointe Claire, PQ, Canada
H9R 5Z8

to the insurers at:

Export Development Canada
151 O'Connor Street
Ottawa, Ontario, Canada
K1A 1K3

Attention: Mr. Claude Boyer

Attention: Susanne Martin

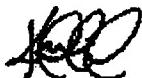
Tel. Number: 514-694-9000
Fax Number: 514-694-3510

Tel. Number: 1-888-336-9514
Fax Number: 613-598-6858

e-mail address:

e-mail address: smartin@edc.ca

EXPORT DEVELOPMENT CANADA,
for the Insurers





The St Paul

St. Paul Guarantee Insurance Company
Compagnie d'Assurance St. Paul Garantie

COVERAGE CERTIFICATE

Accounts Receivable Policy (Shipments)

Insured: Mitec Télécom Inc.
Policy Number: GG 1 13778
Issued: November 8th, 2004
Effective: November 1st, 2004
Reference Number: 3

This Policy is issued in Ottawa, Ontario by Export Development Canada ("EDC") and by St. Paul Guarantee Insurance Company ("St. Paul Guarantee") (together referred to as the "Insurers"), to Mitec Télécom Inc. (the "Insured"). This Certificate forms part of the Policy and, as of its effective date, it replaces any previous Coverage Certificate.

SPECIFIC TERMS OF COVERAGE PROVIDED UNDER THE POLICY ARE SET OUT BELOW

Coverage Effective Date:	May 1st, 2004
Policy Period:	May 1st to April 30th of each year. If the Policy is terminated on a date other than April 30th the last Policy Period will end on such termination date.
Anniversary Date:	May 1st of each year
Acceptance Fee:	CAD 0
Policy Currency:	USD
EDC's Maximum Liability Amount:	USD 7,000,000
St. Paul Guarantee's Maximum Liability Amount:	USD 725,000
Declaration Period:	Monthly
Declaration Currency:	USD

Insurance Percentage: 90% (subject to section 16 of the Policy General Terms and Conditions)

Deductible: USD 100,000 **Effective Date:** May 1st, 2004

Deductible Period: May 1st to April 30th of each year.
If the Policy is terminated on a date other than April 30th, the Deductible Period shall end as of the termination date.

EXCLUDED CONTRACTS

- Any sales contract with a buyer located in People's Republic of China

[REDACTED] ADDRESS FOR NOTICES

to the Insured at:

Mitec Télécom Inc.
9000 rte Transcanadienne
Montréal, PQ, Canada
H9R 5Z8

to the Insurers at:

Export Development Canada
151 O'Connor Street
Ottawa, Ontario, Canada
K1A 1K3

Attention: Mr. Claude Boyer

Tel. Number: 514-694-9000
Fax Number: 514-694-3510

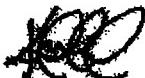
e-mail address: cboyer@mitectelecom.com

Attention: Mike Brownhill

Tel. Number: 1-866-884-6123
Fax Number: 613-598-6858

e-mail address: mbrownhill@edc.ca

EXPORT DEVELOPMENT CANADA,
for the Insurers




The St Paul

 St. Paul Guarantee Insurance Company
 Compagnie d'Assurance St. Paul Garantie

COVERAGE CERTIFICATE

Accounts Receivable Policy (GC) (Shipments)

Insured: Mitec Télécom Inc.

Policy Number: GG 1 13778

Issued: June 24th, 2005

Effective: June 1st, 2005

Reference Number: 4

This Policy is issued in Ottawa, Ontario by Export Development Canada ("EDC") and by St. Paul Guarantee Insurance Company ("St. Paul Guarantee") (together referred to as the "Insurers"), to Mitec Télécom Inc. (the "Insured"). This Certificate forms part of the Policy and, as of its effective date, it replaces any previous Coverage Certificate.

SPECIFIC TERMS OF COVERAGE PROVIDED UNDER THE POLICY ARE SET OUT BELOW

Coverage Effective Date:	May 1st, 2004
Policy Period:	May 1st to April 30th of each year. If the Policy is terminated on a date other than April 30th the last Policy Period will end on such termination date.
Anniversary Date:	May 1st of each year
Acceptance Fee:	CAD 0
Policy Currency:	USD
EDC's Maximum Liability Amount:	USD 7,000,000
St. Paul Guarantee's Maximum Liability Amount:	USD 725,000
Declaration Period:	Monthly
Declaration Currency:	USD

Insurance Percentage: 90% (subject to section 16 of the Policy General Terms and Conditions)

Deductible: USD 100,000 **Effective Date:** May 1st, 2005

Deductible Period: May 1st to April 30th of each year.
If the Policy is terminated on a date other than April 30th, the Deductible Period shall end as of the termination date.

EXCLUDED CONTRACTS

- Any sales contract with a buyer located in People's Republic of China

ADDRESS FOR NOTICES

to the Insured at:

Mitec Télécom Inc.
9000 rte Transcanadienne
Montréal, PQ, Canada
H9R 5Z8

to the Insurers at:

Export Development Canada
151 O'Connor Street
Ottawa, Ontario, Canada
K1A 1K3

Attention: Mr. Claude Boyer

Attention: Peter Nehme

Tel. Number: 514-694-9000x2125

Tel. Number: 1-866-337-1546

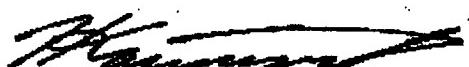
Fax Number: 514-694-3510

Fax Number: 613-598-6858

e-mail address: cboyer@mitectelecom.com

e-mail address: pnehrne@edc.ca

EXPORT DEVELOPMENT CANADA,
for the Insurers





Export Development Canada
Exportation et développement Canada

The St Paul

St. Paul Guarantee Insurance Company
Compagnie d'Assurance St. Paul Garantie

COVERAGE CERTIFICATE

Accounts Receivable Policy (GC) (Shipments)

Insured: Mitec Télécom Inc.
Policy Number: GG 1 13778
Issued: August 25th, 2005
Effective: August 1st, 2005
Reference Number: 5

This Policy is issued in Ottawa, Ontario by Export Development Canada ("EDC") and by St. Paul Guarantee Insurance Company ("St. Paul Guarantee") (together referred to as the "Insurers"), to Mitec Télécom Inc. (the "Insured"). This Certificate forms part of the Policy and, as of its effective date, it replaces any previous Coverage Certificate.

SPECIFIC TERMS OF COVERAGE PROVIDED UNDER THE POLICY ARE SET OUT BELOW

Coverage Effective Date:	May 1st, 2004
Policy Period:	May 1st to April 30th of each year. If the Policy is terminated on a date other than April 30th the last Policy Period will end on such termination date.
Anniversary Date:	May 1st of each year
Acceptance Fee:	CAD 0
Policy Currency:	USD

EDC's Maximum Liability Amount:	USD 7,000,000
St. Paul Guarantee Maximum Liability Amount:	USD 725,000

Declaration Period:	Monthly
Declaration Currency:	USD

Insurance Percentage: 90% (subject to section 16 of the Policy General Terms and Conditions)

Deductible: USD 100,000 **Effective Date:** May 1st, 2005

Deductible Period: May 1st to April 30th of each year.
If the Policy is terminated on a date other than April 30th, the Deductible Period shall end as of the termination date.

ADDRESS FOR NOTICES

to the Insured at:

Mitec Télécom Inc.
9000 autoroute Transcanadienne
Montréal, PQ, Canada
H9R 5Z8

to the Insurers at:

Export Development Canada
151 O'Connor Street
Ottawa, Ontario, Canada
K1A 1K3

Attention: Mr. Claude Boyer

Attention: Peter Nehme

Tel. Number: 514-694-9000x2125

Tel. Number: 1-866-337-1546

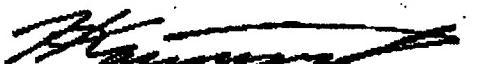
Fax Number: 514-694-3510

Fax Number: 613-598-6858

e-mail address: cboyer@mitectelecom.com

e-mail address: pnehme@edc.ca

EXPORT DEVELOPMENT CANADA,
for the Insured





The St Paul

St. Paul Guarantee Insurance Company
Compagnie d'Assurance St. Paul Garantie

COVERAGE CERTIFICATE

Accounts Receivable Policy (GC) (Shipments)

Insured: Mitec Télécom Inc.
Policy Number: GG 1 13778
Issued: April 28th, 2006
Effective: April 1st, 2006
Reference Number: 8

This Policy is issued in Ottawa, Ontario by Export Development Canada ("EDC") and by St. Paul Guarantee Insurance Company ("St. Paul Guarantee") (together referred to as the "Insurers"), to Mitec Télécom Inc. (the "Insured"). This Certificate forms part of the Policy and, as of its effective date, it replaces any previous Coverage Certificate.

SPECIFIC TERMS OF COVERAGE PROVIDED UNDER THE POLICY ARE SET OUT BELOW

Coverage Effective Date:	May 1st, 2004
Policy Period:	May 1st to April 30th of each year. If the Policy is terminated on a date other than April 30th the last Policy Period will end on such termination date.
Anniversary Date:	May 1st of each year
Acceptance Fee:	CAD 0
Policy Currency:	USD

EDC's Maximum Liability Amount:	USD 7,000,000
St. Paul Guarantee Maximum Liability Amount:	USD 725,000

Declaration Period:	Monthly
Declaration Currency:	USD

Insurance Percentage: 90% (subject to section 16 of the Policy General Terms and Conditions)

Deductible: USD 100,000 **Effective Date:** May 1st, 2005

Deductible Period:
May 1st to April 30th of each year.
If the Policy is terminated on a date other than April 30th, the Deductible Period shall end as of the termination date.

ADDRESS FOR NOTICES

To the Insured at:

Mitec Télécom Inc.
9000 autoroute Transcanadienne
Montréal, PQ, Canada
H9R 5Z8

To the Insurers at:

Export Development Canada
151 O'Connor Street
Ottawa, Ontario, Canada
K1A 1K3

Attention: Ms. Merlene Ferguson

Tél. Number: 514-694-9000x2114
Fax Number: 514-694-3510

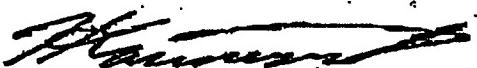
e-mail address: merlene.ferguson@mitectelecom.com

Attention: Peter Nehme

Tel. Number: 1-866-337-1546
Fax Number: 613-598-6858

e-mail address: pnehme@edc.ca

EXPORT DEVELOPMENT CANADA,
for the Insurers



No. 500-17-040674-080

SUPERIOR COURT
DISTRICT OF MONTREAL

MITEC TELECOM INC.,

Plaintiff
v.

BIP CORPORATION,

Defendant
-and-

EXPORT DEVELOPMENT CANADA,

Mise en cause

Me Anca Neacsu

File : 606778-127

EXHIBIT P-6



FRASER MILNER CASGRAIN LLP

1, PLACE VILLE-MARIE • 39TH FLOOR
MONTREAL QC H3B 4M7
TELEPHONE: (514) 878-8800 • FAX: (514) 866-2241

BB0822



Claim Payment Application

INSURED/POLICYHOLDER NAME

Mitec Telecom Inc

POLICY NUMBER

GE 13778

Buyer Name and Address

Buyer's LEGAL name: BIP CORPORATION

Trade style (if applicable): _____

Address: 1650 LINDA VISTA DRIVE

Tel.: 760-591-9822

Fax: 866-510-6562

City: SAN MARCOS

Province/State: CA

Postal code: 92069

Country: USA

Email: _____

RISK CATEGORY (Please check the appropriate risk)

- Insolvency Nonpayment Repudiation Conversion and Transfer War Export Permit Import Permit

SUPPORTING DOCUMENTATION REQUIRED (Please check and attach pertinent copies of documentation)

- | | | | |
|---|---|--|---|
| 01 <input type="checkbox"/> Credit Information | 02 <input checked="" type="checkbox"/> Invoices | 03 <input checked="" type="checkbox"/> Statement of Account | 04 <input type="checkbox"/> Proof of Debt |
| 05 <input type="checkbox"/> Proof of Shipment | 06 <input type="checkbox"/> Proof of Insolvency | 07 <input checked="" type="checkbox"/> Relevant Correspondence | 08 <input checked="" type="checkbox"/> Other Supporting Documentation |
| 09 <input type="checkbox"/> What action have you taken to effect collection. Please provide the name of Agency or Lawyer. | | | |

CALCULATION OF CLAIM

10 Contract Currency

US DOLLAR

11 Gross Invoice Value (excluding taxes)

\$ 488050.52

12 Less payments received

\$

13 Less Amounts Credited to Account

\$

14 Less Agent's Commission Being Held

\$

15 Less Offsets/Deductions

\$

16 Sub-total

\$ 488050.52

17 Net Loss

\$

CERTIFICATION

I, LYNE POULIOT
(Name in block letters)

of MITEC TELECOM INC
(Insured/Policyholder Name)

I have examined the information included in this Claim Payment Application and certify that except as already disclosed, the Insured/Policyholder holds no sums, credits, indemnity, or security against the Buyer's account, and that it has no admissible claim against its agent in respect of commissions or other risks assumed by it. The Insured/Policyholder has not insured, assigned, pledged or otherwise disposed of any part of the purchase price receivable in respect of the goods or services.

I certify that there are no disputes whatsoever in respect of the transaction(s) mentioned above. I further certify that the Insured/Policyholder is not in breach of any terms and conditions of the Policy, and declare that it has sustained a loss in respect of a risk covered by the Policy.

Authorized Signature

09/20/07
Date

Your company's contact for insurer queries relating to information on this application.

MERLENE FERGUSON

CREDIT SPECIALIST

514-694-8666 EXT 2114

514-694-3510

Name

Title

Telephone

Fax

***** Print date 09/27/07 16:47:56 ***** Username MFERGUSOR
MITEC TELECOM CURRENCY: U.S. DOLLAR DATE 09/27/07 PAGE
AGED RECEIVABLES REPORT FOR 09/27/07 FOR CUSTOMER BIP001

CUSTOMER ID	NOT DUE	1-	31-	61-	OVER	TC	
			30	60	90		
INVOICE INVOICE CUSTOMER CUSTOMER							
# DATE ORDER # PO#							
BIP001 BIP Corporation		PHONE: 760-591-9822					
+0985891 05/30/06 F0055005	0603271162				141.67		
+0987065 09/15/06 V0055345	0606055821				115.78		
+0987202 09/28/06 F0055657	0608093665				129.47		
+0987480 10/18/06 F0055689	0608240831				48.76		
+0989588 05/16/07 F0056092	0611135228				5090.00		
+0989605 05/17/07 V0056928	0705102115				1000.00		
+0989628 05/18/07 V0056932	0705112408				6700.00		
+0989633 05/18/07 V0056913	0705100064				30504.00		
+0989688 05/28/07 V0056100	0610305437				43750.00		
+0989737 06/01/07 F0056092	0611135228				4620.00		
+0989752 06/04/07 S0057040	0706013200				40.00		
+0989767 06/05/07 V0056940	0705147219				5600.00		
+0989870 06/19/07 F0056092	0611135228				11800.00		
+0989912 06/21/07 RV0004426	0706114426				375.00		
+0989913 06/21/07 RV0004427	0706204427				660.00		
+0989974 06/29/07 V0056989	0705113152				34200.00		
+0989982 07/03/07 V0057189	0707024091				4200.00		
990013 07/06/07 F0056092	0611135228				6750.00		
990040 07/09/07 V0057115	0706154209				13200.00		
+0990195 07/27/07					319125.84		
CUSTOMER TOTALS					377475.84	110574.68	488050.

No. 500-17-040674-080

SUPERIOR COURT
DISTRICT OF MONTREAL

MITEC TELECOM INC.,

Plaintiff

v.

BIP CORPORATION,

Defendant

-and-

EXPORT DEVELOPMENT CANADA,

Mise en cause

Me Anca Neacsu

File : 606778-127

EXHIBIT P-7



FRASER MILNER CASGRAIN LLP

I, PLACE VILLE-MARIE • 39TH FLOOR
MONTRÉAL QC H3B 4M7
TELEPHONE: (514) 878-8800 • FAX: (514) 866-2241

BB0822



December 11, 2007

Ms. Merlene Ferguson
Mitec Telecom Inc.
6900 Autoroute Transcanadienne
Montréal, Québec
H9R 5Z8

Subject: Claim Payment Application - BIP Corporation "Buyer"

Dear Ms. Ferguson,

Further to our telephone conversation and after review of the documentation provided with the above-mentioned Claim Payment Application, we wish to confirm that we have completed our analysis.

EDC cannot accept liability of the claim for the following reason:

- Dispute (Section 7): "If there is a Dispute between the Insured and the Buyer with regard to any matter which brings into question the amount owing (or whether there is any amount owing) by the Buyer to the Insured (a "Dispute"), the Insurers shall have no liability with respect to the claim until the Dispute is finally settled, by negotiation or otherwise, and the Loss amount is clearly established."

Do not hesitate to contact the undersigned should you have any questions..

Claims Services Manager
Claims Unit
Directrice des services d'indemnisation
Unité des indemnisations

No. 500-17-040674-080

SUPERIOR COURT
DISTRICT OF MONTREAL

MITEC TELECOM INC.,

Plaintiff
v.

BIP CORPORATION,

Defendant
-and-

EXPORT DEVELOPMENT CANADA,

Mise en cause

Me Anca Neacsu

File : 606778-127

EXHIBIT P-8



FRASER MILNER CASGRAIN LLP

1, PLACE VILLE-MARIE • 39TH FLOOR
MONTREAL QC H3B 4M7
TELEPHONE: (514) 878-8800 • FAX: (514) 866-2241

BB0822